





Submitted via email and U.S. Mail

April 18, 2019

Mr. Richard Corey, Executive Officer
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Additional Flexibility for Testing and Maintenance of Emergency Backup Generators Designated for Critical Water System Facilities for Fire Protection

Dear Mr. Corey:

The undersigned water agencies request your assistance to evaluate opportunities to provide additional flexibility for testing and maintenance of emergency backup generators designed to provide backup power to critical water system facilities for fire protection.

In 2018, California experienced one of the most devastating wildfire seasons on record. The Woolsey Fire in Southern California burned nearly 100,000 acres, destroyed 1,643 buildings and resulted in three fatalities. In the early morning hours of November 9, 2018, Las Virgenes Municipal Water District (LVMWD) lost power to nearly all of its facilities due to the fire. Emergency backup generators were deployed to restore the operation of critical pump stations to refill water storage tanks that were being depleted due to firefighting. Nevertheless, a sequence of events ultimately lead to a loss of water system pressure and issuance of boil water notice for a portion of LVMWD's service area. Among the challenges faced by LVMWD during the fire was the failure of emergency generators when placed under load conditions for an extended period of time.

Amendments to the Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition Engines, Section 93115.3(n), recognize the importance of National Fire Protection Association (NFPA) standards for testing fire protection systems and appropriately exempts in-use emergency fire pump assemblies from the requirements of Section 93115.6(b)(3), provided they are only operated the number of hours necessary to comply with NFPA 25. Unfortunately, there is not a similar provision for emergency backup generators that are designated to provide emergency power to critical public water system facilities required for fire protection. We recommend that such a provision be added for these specified emergency backup generators.

NFPA 110, Standard for Emergency and Standby Power System, outlines rigorous maintenance and testing procedures for emergency backup generators. The requirements of the standard are cited as necessary to obtain a minimum level of reliability and performance, particularly where life safety electrical power needs are involved. However, the ATCM limits the annual maintenance and testing of the diesel-fueled compression ignitions engines that power these emergency backup generators to as little as 20 hours based on the age of the unit and emission rate of diesel particulate matter. The prescribed NFPA 110 maintenance and testing procedures, including monthly exercising and periodic load tests, cannot be effectively performed while adhering to the strict operating limits established by these regulations.

To ensure the reliability of fire protection water systems, there is an interest by water utilities, specifically in Southern California but more broadly throughout California, for the California Air Resources Board (CARB) to recognize the operational requirements for emergency backup generators that are designated to provide emergency power to critical public water system facilities required for fire protection. Most of these generator engines are over 50 horsepower and regulated by regional air agency permits, which require compliance with local air rules that cannot be less stringent than the ATCM. Therefore, even if a local air agency were to consider the merits of allowing an exemption to operating requirements for designated emergency power to critical public water system facilities, it could not offer this important flexibility to water agencies or other fire response organizations as the action could be considered a relaxation of the ATCM.

On March 6, 2019, we sent the enclosed letter to Mr. Wayne Nastri, Executive Officer of the South Coast Air Quality Management District (SCAQMD), and requested consideration of a proposed amendment to Rule 1470 to address the concern. A meeting is scheduled with Mr. Nastri and key SCAQMD staff members on April 25th at 9:00 a.m. to discuss the concern and proposal in more detail. However, in the course of initial discussions with SCQAMD staff, it became apparent that we should bring the concern to your attention given the application of CARB's ATCM. As a result, we would like to request that you consider a similar amendment to the ACTM for this purpose.

Enclosed for your review is a proposed amendment to ATCM Section 93115.3(n) to ensure that emergency backup generators used to power critical water system facilities can be adequately maintained and tested, in accordance with NFPA standards, for reliable operation during emergencies.

Thank you for considering this important proposal. If you or your staff have questions about the proposal, please do not hesitate to contact David W. Pedersen, General Manager of Las Virgenes Municipal Water District, at (818) 251-2122 or dpedersen@lvmwd.com.

Sincerely,



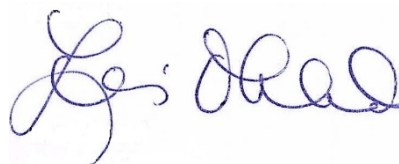
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General Manager
Las Virgenes Municipal Water District



Barry Moline
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California Municipal Utilities Association



Paul A. Cook
General Manager
Irvine Ranch Water District



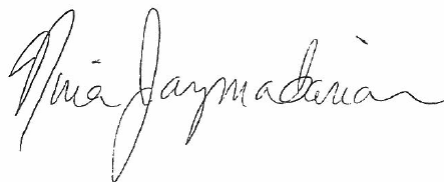
Lisa Ohlund
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Nina Jazmadarian
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Robert J. Hunter
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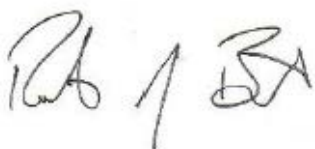
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Southern California



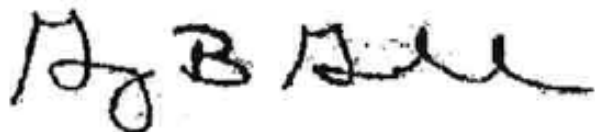
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P. David Michalko
General Manager
Valencia Heights Water Company



Erik Hitchman
General Manager
Walnut Valley Water District



Greg Galindo
General Manager
La Puente Valley County Water District



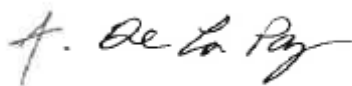
Alberto Corrales
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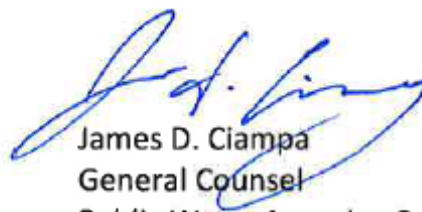
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Alexander R. Coate
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Mitchell S. Dion
Assistant General Manager
Pasadena Water and Power

PROPOSED AMENDMENT TO ATCM SECTION 93115.3(n)

Existing Language

(n) The requirements of section 93115.6(b)(3) do not apply to in-use emergency fire pump assemblies that are driven directly by stationary diesel-fueled CI engines and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 2002 edition, which is incorporated herein by reference.

Proposed Language

(n) The requirements of section 93115.6(b)(3) do not apply to **the following:**

- (1) in-use emergency fire pump assemblies that are driven directly by stationary diesel-fueled CI engines and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 25 "Standard for the Inspection, Testing, and Maintenance of Water-Based Fire Protection Systems," 2002 edition, which is incorporated herein by reference; **or**
- (2) **emergency backup generators driven directly by stationary diesel-fueled CI engines, designated to provide emergency backup power to critical public water system facilities required for fire protection, and only operated the number of hours necessary to comply with the testing requirements of National Fire Protection Association (NFPA) 110 "Standard for Emergency and Standby Power Systems," 2019 edition, which is incorporated herein by reference.**